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April 14, 2023

via CM/ECF

Honorable Robert W. Lehrburger
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007

RE: MSR Trust v. Nationstar Mortgage LLC
 Case Number: 1:21-cv-03089-GBD-RWL
Joint Motion for Stay

Dear Judge Lehrburger:

We represent Plaintiff MSR Trust (“MSR Trust”) in the above-referenced matter. We write jointly with Defendant Nationstar Mortgage LLC (“Nationstar”) to request a 60-day stay of all deadlines in this matter.

There is a good faith basis for this request. As noted in the last status report dated March 24, 2023 (Doc. 65), the parties have exchanged a significant number of documents. Following review of same, the parties determined it would be a better use of their efforts to focus on resolution. Therefore, in accordance with the final bullet point of the March 24 status report, the parties seek a 60-day stay to pursue settlement discussions with the hope of reaching a final resolution of all claims and counterclaims by the end of the stay. The parties have already been engaged in settlement discussions over the last several weeks and are hopeful that they can reach a resolution within this 60-day period.

If either party believes the settlement discussions have become unproductive and seeks to lift the stay, then such party must notify the other party of the same. Should either party seek to lift the stay, or should the 60-day stay expire without the parties reaching a resolution, the parties agree that they will promptly meet and confer to attempt to agree on a proposed amended case management schedule, and request that the Court lift the stay and enter the proposed amended schedule. In addition, each party reserves all objections and rights with respect to discovery.

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This is the first request by either party for a stay of all deadlines to pursue settlement discussions. Though, the parties have previously sought and obtained one extension of the discovery deadlines in this matter (*See Doc. 60*).

Thank you for your consideration.

Respectfully submitted,



Amy S. Kline

CC: All Counsel of Record (via CM/ECF)

SO ORDERED:

4/17/2023 

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE